

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

DVORA WEINSTEIN AND STEVEN S.	:	
WEINSTEIN, Individually and On Behalf of All	:	Case No. CIV-12-465-M
Others Similarly Situated,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
AUBREY K. McCLENDON and	:	
CHESAPEAKE ENERGY CORPORATION,	:	
	:	
Defendants.	:	

STIPULATION AND JOINT MOTION FOR ORDER EXTENDING TIME  
TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT

WHEREAS, on April 26, 2012, Plaintiffs Dvora Weinstein and Steven S. Weinstein, through their counsel, filed a proposed class action complaint (the "Complaint") in the above-captioned action against Chesapeake Energy Corp. ("Chesapeake") and Aubrey K. McClendon ("McClendon") (the "Action");

WHEREAS, Chesapeake and McClendon are collectively referred to as the "Defendants";

WHEREAS, Defendants, by and through their undersigned counsel, seek to extend the time within which they must answer, move or otherwise respond to the Complaint;

WHEREAS, this is the first request for an extension of time to answer, move or otherwise respond to the Complaint;

WHEREAS, Plaintiffs in the Action, through their counsel, has consented to Defendants' request to extend the time within which Defendants must answer, move or otherwise respond to the Complaint;

WHEREAS, the time for filing of motions for appointment of Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4, has not yet passed;

WHEREAS, this stipulation is entered into without prejudice to further extensions;

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel that:

1. Defendants, by and through their undersigned counsel, accept service of process of the Summons and Complaint.

2. Defendants shall have no obligation to respond to the Complaint until after the filing of, and the Court's decision and entry of an order on, motion(s) to be appointed as lead plaintiff and after the filing of an Amended Complaint. The parties shall confer thereafter regarding a schedule to respond to the Amended Complaint, and any related motion practice.

3. By entering into this stipulation, each party acknowledges that Plaintiff and Defendants reserve all of their respective claims and rights to assert all defenses and objections, including those relating to personal and/or subject matter jurisdiction, venue and/or the appropriateness of this forum, and any other defenses Defendants may raise under Federal Rule of Civil Procedure 12, except as those relating to service provided in Paragraph 1.

4. This stipulation and agreement is without prejudice to further extensions.

WHEREFORE, the parties request that the Court having reviewed this Stipulation and the Joint Motion enter the proposed Order extending the deadline to answer or otherwise respond to the Complaint as outlined herein.

Dated: May 25, 2012

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*Counsel for Defendants*

CERTIFICATE OF SERVICE

I hereby certify that on the 25<sup>th</sup> day of May, 2012, I electronically transmitted the attached document to the Clerk of the Courts using the ECF System for filing. Based on the records currently on file, the Clerk will transmit a Notice of Electronic Filing to the following ECF registrants:

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s/ John E. Barbush  
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